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The July 1, 2025 conference  
is canceled. The Plaintiff should file  
proof of service promptly after  
May 27, 2025

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VIA ECF

Hon. John G. Koeltl, U.S.D.J.

United States District Court for the Southern District of New York  
500 Pearl Street, Room 14A  
New York, New York 10007

Dr 6/Kelby/US.D.J.  
5/28/25-

Re: Nirmal Intellectual Property Corp. v. Ilam Singh Bansal, 24-cv-9392 (JGK)

Dear Hon. Judge Koeltl:

We represent Plaintiff Nirmal Intellectual Property Corporation (“Plaintiff”) in the above-referenced action.

We respectfully request that, pursuant to Fed. R. Civ. P. 6(b) and for good cause demonstrated herein, the Court adjourn the initial conference scheduled for July 1, 2025, at 12:30 p.m., until a later date to be determined that is within ninety (90) days after Plaintiff confirms that service of the summons and complaint on the Defendant is complete.

Defendant Ilam Singh Bansal (“Defendant”) resides in India. Complaint ¶ 3. Under the Hague Convention, service on an Indian national must be made via a Request for Service Abroad of Judicial or Extrajudicial Documents (“Request”) to the Central Authority in India, namely, The Ministry of Law and Justice (the “Ministry”). Plaintiff sent its Request with copies of the summons and complaint to the Ministry on April 4, 2025. As of yet, the Ministry has not confirmed service. Some Internet sources have reported that the Ministry can take at least 6 to 9 months to process a Request. Although the initial conference is not scheduled until July 1, 2025, Fed. R. Civ. P. 26(f) mandates that the parties participate in their Rule 26(f) conference no later than June 10, 2025, in approximately 2 weeks. Since Defendant has not yet appeared, there is no party with whom to conduct the Rule 26(f) conference. Moreover, the undersigned has a previously planned family vacation at the time of the currently scheduled conference.

Plaintiff therefore respectfully requests that the Court adjourn the current initial conference and reschedule the conference once Plaintiff files proof of service, which Plaintiff will file within 7 days after receipt of confirming of service from the Ministry

Respectfully submitted,

By:/s/ Eric J. Shimianoff

Eric J. Shimianoff